EXHIBIT 1

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

ELLEN GERHART, ELISE GERHART,

ALEX LOTORTO, and ELIZABETH :

GLUNT,

Plaintiffs, : No.: 1:17-CV-1726-YK

.

V.

: (Judge Kane)

ENERGY TRANSFER PARTNERS, et al. :

•

Defendants. : JURY TRIAL DEMANDED

:

<u>DEFENDANT NICHOLAS JOHNSON'S OBJECTIONS AND RESPONSES</u> <u>TO PLAINTIFFS' SECOND SET OF INTERROGATORIES</u>

Defendant Nicholas Johnson ("Answering Defendant"), by and through his counsel, Siana Law, LLP asserts the following Objections and Responses to Plaintiffs' Second Set of Interrogatories as follows:

INTERROGATORIES

1. Describe in detail the agreement you referenced on pages 9 and 67-68 that you alleged bound you not to answer question "to the best of your knowledge were you in North Dakota in August of 2017," including but not limited to when any such agreements was executed, any other parties to the agreement, the consideration for any such agreement, whether the agreement is with TigerSwan and/or Cedar Fork Partners, the period of time the agreement covers, and the specific terms of any such agreement.

<u>OBJECTION</u>: Answering Defendant objects to this Interrogatory to the extent that it seeks any information beyond the Mariner East 2 project. Any such agreement that is not related to Mariner East 2 is not relevant to the claims or defenses and is not proportional to the needs of the case.

By way of further objection, see ECF 131. While Answering Defendant acknowledges Plaintiffs' Second Set of Interrogatories were propounded before this Court's March 4, 2022 Order, Answering Defendant objects to this Interrogatory to the extent that Plaintiffs' request to broaden the scope of discovery was denied.

<u>RESPONSE</u>: Subject to and without waiving these objections, and to the extent Interrogatory No. 1 is not objectionable, Answering Defendant did not enter into any non-disclosure agreement or any other similar agreement pertaining to his publications regarding his work on the Mariner East 2 project.

SIANA LAW

Date: April 7, 2022 By: /s/ Christopher P. Gerber

Christopher P. Gerber, Esquire, I.D. #76449 Connie E. Henderson, Esquire, I.D. #327325

Attorneys for Defendant, Nick Johnson

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VERIFICATION

I, Nicholas Johnson, depose and say that Defendants' Objections and

Responses to Plaintiffs' Second Set of Interrogatories are true and correct to the best

of my knowledge, information, and belief.

I understand that any false statements therein are subject to the criminal

penalties contained in 18 Pa. C.S. § 4904, relating to unsworn falsification to

authorities.

Date: 4/7/22

By: /s/ Nick Johnson

Nicholas Johnson

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF PENNSYLVANIA

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<u>:</u>

CERTIFICATE OF SERVICE

The undersigned counsel certifies that on this day a true and correct copy of the foregoing Defendant Nicholas Johnson's Objections and Responses to Plaintiff's Second Set of Interrogatories was served via email and/or first-class mail, addressed to the following:

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SIANA LAW

Date: April 7, 2022 By: /s/ Christopher P. Gerber

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